

**UNITED STATES DISTRICT COURT  
For The Southern District Of New York**

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**COUNTER TERRORIST GROUP US,  
and J. K. IDEMA,**

*Plaintiffs,*

v.

**ASSOCIATED PRESS,  
ASSOCIATED PRESS TV NEWS,  
PAUL HAVEN, STEPHEN GRAHAM,  
JASON STRAZZIO, AMIR SHAH,  
JOHN DOES 1-7,**

*Defendants.*

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**SUBSTITUTION AND  
JOINDER**

**Case # 07 CV 6299**

**Assigned Judge:  
Hon. Deborah A. Batts**

**NOW COME**, Plaintiffs, and make the following substitutions and joinders as Defendants:

**ADDITIONAL DEFENDANTS**

1. Defendant JOHN DOE 1 is hereby substituted for the named party identified as DUNCAN CAMPBELL (hereafter “Campbell”). Campbell is a journalist who worked with The Associated Press Defendants and republished the statements complained of in the original Complaint and engaged in other wrongful conduct as described in the Complaint. Campbell is believed to be a resident of London, England.

2. KITTY LOGAN (hereafter “Logan”) is joined as a party and co-conspirator with Duncan Campbell. Logan is a journalist who worked with The Associated Press Defendants and republished the statements complained of in the original Complaint and engaged in other wrongful conduct as described in the Complaint. Logan’s residence is unknown at this time but it is believed she is a United States citizen.

3. Defendant JOHN DOE 2 is hereby substituted for the named party identified as STEVEN GILLARD, JR., *aka* Steve Gillard *dba* SteveGillard.blogspot.com, *aka* Steve Gillard *dba* www.thenewsblog.net (collectively hereafter “Gillard”). Gillard is a freelance journalist and self described “left-wing political blogger” who worked with The Associated Press Defendants and republished the statements complained of in the original Complaint and engaged in other wrongful conduct as described in the Complaint. Gillard is believed to have been a resident of New York

City, New York. Gillard died on June 2, 2007, and is therefore sued in his deceased capacity as Defendant THE ESTATE OF STEVEN R. GILLARD, JR.

4. Gillard's blogs are joined as co-conspirators, as Defendant WWW.THENEWSBLOG.NET; Defendant STEVEGILLARD.BLOGSPOT.COM, and Defendant WWW.THEDAILYKOS.COM blog (collectively hereafter "The Gillard Blogs").

5. JEN R. DOE (hereafter "JEN R.") is joined as a party and co-conspirator with The Estate of Steven R. Gillard, Jr. Jen R. is described on various Gillard related websites as Gillard's "silent blog partner" and a resident of New York City. JEN R. republished the statements complained of in the original Complaint and engaged in other wrongful conduct as described in the Complaint.

6. GOOGLE INC. is joined as a party and con-conspirator which has hosted the Gillard websites and others, published Plaintiffs' copyright protected images, and republished the statements complained of in the Complaint and is joined as a defendant. Defendant Google Inc. is an internet company, owned by Evans Williams, among others, doing business throughout the United States with an address of 1600 Amphitheatre Parkway, Building #47, Mountainview, California 94043. GOOGLE INC. operates under the mantra of first do no harm when promoting their business and websites.

7. PRYRA.COM LTD is joined as a party and con-conspirator which has hosted the Gillard websites and others, published Plaintiffs' copyright protected images, and republished the statements complained of in the Complaint and is joined as a defendant. Defendant Pyra.com Ltd is a blog provider and is owned by Google, Inc. doing business throughout the United States, with its corporate offices located in the county of San Francisco, California.

8. BLOGGER.COM is joined as a party and con-conspirator which has hosted the Gillard websites and others, published Plaintiffs' copyright protected images, and republished the statements complained of in the Complaint and is joined as a defendant. Blogger.com is a blog provider and is owned by Pyra.com Ltd doing business as Blogger.com, which is owned by Google, Inc. and doing business throughout the United States.

9. BLOGSPOT.COM is joined as a party and con-conspirator which has hosted the Gillard websites and others, published Plaintiffs' copyright protected images, and republished the statements complained of in the Complaint and is joined as a defendant. BlogSpot.com is a blog

provider and is owned by Pyra.com Ltd, doing business as Pyra.com Ltd, which is owned by Google, Inc. and doing business throughout the United States.

10. Defendant JOHN DOE 3 is hereby substituted for the named party identified as MARKOS MOULITSAS ZUNIGA (hereafter “Zuniga”). Zuniga is the Publisher/Founder of the DailyKos blog.

11. KOS MEDIA, LLC which is Zuniga’s umbrella company for Zuniga’s website, DAILYKOS.COM, is also joined as his co-Defendant.

12. Defendant JOHN DOE 4 is hereby substituted for the named party identified as MATTHEW WEEMS, *dba* www.WarlordsOfAfghanistan.com, *dba* Weems Illustration. Weems describes himself as a self-employed illustrator, and engaged in the wrongful conduct alleged in the Complaint and the creation of derivative works copyrighted by The Associated Press and other derivative works copyrighted by Plaintiffs, and other wrongful acts as described in the Complaint. Weems is believed to reside at 564 Market St, San Francisco, CA 94104.

13. Weems’ company and website are joined as co-Defendants WEEMS ILLUSTRATION and WWW.WARLORDSOFAFGHANISTAN.COM.

14. Defendant JOHN DOE 5 is hereby substituted for the named party identified as AGONIST INTERMEDIA, INC., Inc., *dba* THE AGONIST (www.agonist.org). Agonist Intermedia describes itself as the holding company for The Agonist web blog, describing it as their “flagship property” which “has become one of the internet's premier blogging communities. [sic]” AGONIST INTERMEDIA., INC and THE AGONIST are collectively referred to hereafter as THE AGONIST, which republished the statements complained of in the original Complaint, made additional false statements, and engaged in other wrongful conduct as described in the Complaint.

15. Defendant JOHN DOE 6 is hereby substituted for the named party identified as the P.O.W. NETWORK (hereafter “POW Network”), which republished the statements complained of in the original Complaint, made additional false statements, published Plaintiffs’ copyright protected images, and engaged in other wrongful conduct as described in the Complaint. The POW NETWORK describes itself as a “501 (c)(3) educational organization since November 11, 1989,” with “all donations tax deductible to the fullest extent of the law,” and claims their “website visitors come from every nation in the world from Ecuador [sic] to Vietnam.” The POW NETWORK lists its IRS identification number as 42-1360 341, with an address of PO Box 68, Skidmore, MO 64487-0068.

16. CHUCK SCHANTAG is joined as a party and co-conspirator with Defendants and as the owner of the POW NETWORK website which republished the statements complained of in the original Complaint, published Plaintiffs' copyright protected images, and engaged in other wrongful conduct as described in the Complaint.

17. MARY SCHANTAG is joined as a party and co-conspirator with The Associated Press Defendants and as the co-owner of the POW NETWORK website which republished the statements complained of in the original Complaint, published Plaintiffs' copyright protected images, and engaged in other wrongful conduct as described in the Complaint. CHUCK and MARY SCHANTAG are hereafter collectively referred to as "the Schantags."

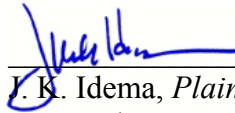
18. Defendant JOHN DOE 7 remains as a JOHN DOE Defendant.

19. The substituted caption now reads as:

<b>COUNTER TERRORIST GROUP US,</b>	)	
<b>and J. K. IDEMA,</b>	)	
<b><i>Plaintiffs,</i></b>	)	
<b>vs.</b>	)	
	)	
<b>ASSOCIATED PRESS,</b>	)	
<b>ASSOCIATED PRESS TV NEWS,</b>	)	
<b>PAUL HAVEN, STEPHEN GRAHAM,</b>	)	<b>Case # 07 CV 6299</b>
<b>JASON STRAZZIO, AMIR SHAH,</b>	)	
<b>DUNCAN CAMPBELL, KITTY LOGAN,</b>	)	
<b>THE ESTATE OF STEVEN R. GILLARD, JR.,</b>	)	
<b>JEN R. DOE, GOOGLE INC.,</b>	)	
<b>PRYRA.COM LTD, BLOGGER.COM,</b>	)	
<b>BLOGSPOT.COM, THENEWSBLOG.NET,</b>	)	
<b>STEVEGILLARD.BLOGSPOT.COM</b>	)	
<b>THEDAILYKOS.COM, JEN R. DOE,</b>	)	
<b>MARKOS MOULITSAS ZUNIGA,</b>	)	
<b>DAILYKOS.COM, KOS MEDIA, LLC,</b>	)	
<b>MATTHEW WEEMS,</b>	)	
<b>WARLORDSOFAFGHANISTAN.COM,</b>	)	
<b>WEEMS ILLUSTRATION,</b>	)	
<b>AGONIST INTERMEDIA. INC.,</b>	)	
<b>THE AGONIST, P.O.W. NETWORK,</b>	)	
<b>CHUCK SCHANTAG,</b>	)	
<b>MARY SCHANTAG, and JOHN DOE 7,</b>	)	
<b><i>Defendants.</i></b>	)	

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Respectfully submitted, this 13th day of October 2007,



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